

IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE

IN RE:)	
)	CHAPTER: 13
DANE LEE BURKS)	CASE NO.: 20-00634
DEANNA WOOD BURKS)	JUDGE: MASHBURN
130 THORNWOOD PL)	
HENDERSONVILLE, TN 37075)	
SSN: XXX-XX-5228/3931)	
Debtors.		

**RESPONSE OF THE DEBTORS TO HOME POINT FINANCIAL CORPORATION'S
NOTICES OF POST-PETITION MORTGAGE FEES, EXPENSES, AND CHARGES**

The Debtors, by and through counsel Lefkovitz & Lefkovitz, PLLC, respectfully respond to Home Point Financial Corporation's Notices of Post-Petition Mortgage Fees, Expenses, and Charges as follows:

1. Home Point Financial Corporation filed an Official Form 410S2 on March 10, 2020 which included the bankruptcy/proof of claim fees at \$950.00 and a separate \$250.00 charge for the required 410A Form attached to the same proof of claim. (*See* Docket No. 22).
2. Home Point Financial Corporation filed a second Official Form 410S2 on July 29, 2020 including a Plan Objection fee of \$500. (*See* Docket No. 55).
3. Specifically, the Plan Objection was for an arrearage difference of \$565.59, which was withdrawn prior to hearing.
4. The Debtors object to these Notices which assert that \$1,700.00 fee should be allowed for filing a proof of claim, charging a separate fee for the claim exhibit, and objecting to the Plan.
5. The Debtors contend that \$1,700.00 is excessive for the amount of work completed by this creditor.

PREMESIS CONSIDERED, Debtors ask this Court to deny these post-petition mortgage fees, expenses, and charges.

Respectfully submitted,

/s/Steven L. Lefkovitz
Steven L. Lefkovitz, No. 5953
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Nashville, TN 37219
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was sent to the Assistant U.S. Trustee, Henry Hildebrand, Chapter 13 Trustee and all other parties of interest to receive notice electronically via CM/ECF on August 20, 2020.

I hereby certify that a true and exact copy of the foregoing was sent, postage prepaid, to the Debtors at the above address and to:

Darrellyn Thomas
Robertson, Anschutz, Schneid & Crain, LLC
10700 Abbott's Bridge Rd. Ste 170
Duluth, GA 30097

D. Anthony Sottile
Sottile & Barile, LLC
394 Wards Corner Rd. Ste 180
Loveland, OH 45140

Home Point Financial Corporation
11511 Luna Rd. Ste 300
Farmers Branch, TX 75234

4 TOTAL USPS MAILINGS \$4.00

/s/ Steven L. Lefkovitz
Steven L. Lefkovitz